

AO 91 (Rev. 11/11) Criminal Complaint

JESSICA  
PERRY

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JESSICA PERRY  
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UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America  
v.  
JENDAYA KASHAR BRENNAN

Case No. M-25-336-AM 6

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of MAY 22, 2025 in the county of OKLAHOMA in the  
Western District of Oklahoma, the defendant(s) violated:

Code Section

49 U.S.C. § 46504

Offense Description

Interference with flight crew members and attendants

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Bailey Kennedy (FBI), which is incorporated by reference.

☒ Continued on the attached sheet.

  
Complainant's signature

SA Bailey Kennedy  
Printed name and title

Sworn to before me and signed in my presence.

Date: 5/23/25

  
Judge's signature

City and state: Oklahoma City, Oklahoma

Amanda Maxfield Green, U.S. Magistrate Judge  
Printed name and title

**WESTERN DISTRICT OF OKLAHOMA  
OKLAHOMA CITY, OKLAHOMA**

**STATE OF OKLAHOMA    )  
  )  
COUNTY OF OKLAHOMA )**

**AFFIDAVIT**

I, Bailey James Kennedy, Special Agent (SA) of the Federal Bureau of Investigation, having been duly sworn, state as follows:

**EXPERIENCE AND TRAINING**

1. I have been employed as a Special Agent (SA) with the FBI since June 2022 and have been assigned to the Oklahoma City Division of the FBI for approximately three years. During the past three years, I have conducted a wide variety of investigations, including cases involving terrorism, firearms violations, and crimes aboard an aircraft.

2. The information in this Affidavit is based on my review of other law enforcement officers' reports and witness statements. The information in this Affidavit is provided for the limited purpose of establishing probable cause for a criminal complaint. As this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation. The facts of this Affidavit will show probable cause that on or about May 22, 2025, **Jendaya Kashar Brennan (BRENNAN)** committed acts in violation of Title 49, United States Code, § 46504, on an aircraft in the special jurisdiction of the United States.

Specifically, while on board Southwest Airlines flight #3239 traveling from Nashville, Tennessee, to Phoenix, Arizona, **BRENNAN** assaulted and intimidated a flight crew member(s) and flight attendant(s) of the aircraft, and interfered with the performance of their duties and lessened their ability to perform their duties, which caused the flight to be diverted to Will Rogers World Airport in Oklahoma City, Oklahoma.

**FACTS SUPPORTING PROBABLE CAUSE**

3. On May 22, 2025, on or about 9:15 p.m., Federal Bureau of Investigation, Oklahoma City Field Office was notified of a disturbance on Southwest Airline Flight #3239. Flight #3239, originally flying from Nashville, Tennessee, to Phoenix, Arizona was being diverted to Oklahoma City, Oklahoma.

4. As reported by on-duty flight crew members C.S., V.A., M.W., C.B., reported **BRENNAN** stated to the Southwest flight attendants that she wanted to exit the plane. **BRENNAN** told C.S. she wanted to get off the plane and was going to utilize the rear exit to get off the plane. C.S. said **BRENNAN** was seated in the very rear row and was attempting to utilize the rear exit of the plane while still in the air. C.S. had to physically block the rear of the plane to prevent **BRENNAN** from trying to use the exit door. **BRENNAN** ignored the flight attendant's orders to remain seated and stop disturbing and frightening passengers.

5. V.A. reported **BRENNAN** continued to try and utilize the rear exit and began screaming that she was going to exit the plane. V.A. stated **BRENNAN** then began screaming she was going to exit the plane in Spanish. **BRENNAN** continued to ignore the flight attendants' orders to sit down and stop attempting to exit the plane. C.S. and V.A. requested the help of M.W. and C.B. to assist in restraining the passenger. Flight crew had to request the assistance of two retired correctional officers, R.D. and D.D., who were passengers on the plane, to assist with restraining **BRENNAN**. C.S., M.W., and C.B. began to apply wrist restraints to **BRENNAN**. While applying the wrist restraints, **BRENNAN** kicked M.E., C.S., and C.B. multiple times in the legs. C.S. and C.B. were spit on by **BRENNAN** while they were attempting to restrain her. **BRENNAN** grabbed M.W. by her identification lanyard that was around M.W.'s neck. **BRENNAN** continued to pull M.W. by the lanyard and other flight crew had to force **BRENNAN**'s hand off M.W.'s lanyard to prevent her from pulling M.W. down. Flight crew applied leg restraints to **BRENNAN** to prevent her from kicking the flight crew. **BRENNAN** continued to fight the flight crew and broke her wrist restraints. R.D. and D.D. had to hold **BRENNAN**'s hand down to prevent her from striking the flight crew or other passengers.

6. V.A. and C.S. radioed to the pilot's cockpit to notify the captain of the situation. The captain advised after he was informed about the situation

and because he could hear the active disturbance, he made the decision to divert the plane to prevent the flight attendants or passengers from being injured. **BRENNAN** continued to actively scream and yell until the flight landed, and Oklahoma City Police Department (OCPD) removed her from the plane.

7. As reported by OCPD officers, once Southwest Flight #3239 landed, they boarded the plane to remove **BRENNAN**. Officers with OCPD reported **BRENNAN** continued to scream and struggle when being removed from the plane. OCPD officers had to physically carry **BRENNAN** off the plane.

8. Agents interviewed **BRENNAN** at the holding area of the Will Rogers International Airport. **BRENNAN** was advised her *Miranda* rights and consented to speaking to agents. **BRENNAN** said she was actively trying to exit the plane while it was still in the air. **BRENNAN** said she kicked multiple flight attendants, spit on flight attendants, and grabbed one of the flight attendants by the lanyard. **BRENNAN** said she was actively causing a disturbance and was not complying with the flight attendant's orders. **BRENNAN** said if the flight attendants were not present to stop her, she would have opened the exit door on the plane. **BRENNAN** said she was aware the plane was still in the air and still wanted to open the exit door to

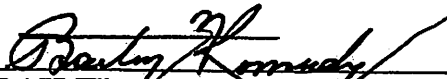
get off the plane. She said was aware of the risk to passengers if she opened the door.

**CONCLUSION**

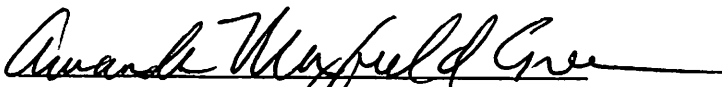
9. Based on the above-stated facts, I believe that there is probable cause to charge **BRENNAN** with the crime of Interference with Flight Crew Members and Attendants in the special aircraft jurisdiction of the United States, in violation of Title 49, United States Code § 46504.

10. I request that the Court issue an arrest warrant for **BRENNAN**.

**FURTHER, YOUR AFFIANT SAYETH NOT.**

  
BAILEY JAMES KENNEDY  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 23rd day of May 2025.

  
AMANDA MAXFIELD GREEN  
United States Magistrate Judge